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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL
 CATALDO, JULIAN
 SANTIAGO, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,
 Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF ALEXANDER
 FRAWLEY ISO PLAINTIFFS' MOTION
 IN LIMINE 9**

The Honorable Richard Seeborg
 Courtroom 3 – 17th Floor
 Date: August 17, 2025

DECLARATION OF ALEXANDER FRAWLEY

I, Alexander Frawley, declare as follows:

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81).

2. I submit this Declaration in Support of Plaintiffs' Motion *In Limine* Number 9 to Exclude Any Reference to the Untimely Disclosed "Privacy and Terms" Document.

3. Attached hereto as **Exhibit 1** are true and accurate excerpts from the proposed David Monsees "demonstrative," which Google sent to Plaintiffs on August 17, 2025.

4. Attached hereto as **Exhibit 2** is a true and accurate copy of Google's proposed trial exhibit G0921. The document was lodged in the Federal Court of Australia on November 26, 2020. According to the metadata of the document, the author is Corrs Chambers Westgarth, which is a law firm based in Sydney Australia. See <https://www.corrs.com.au/>

5. Attached hereto as **Exhibit 3** are true and accurate excerpts from the proposed opening statement slides which Google disclosed to Plaintiffs on August 17, 2025.

6. Attached hereto as **Exhibit 4** is a true and accurate copy of Plaintiffs' Third Set of Interrogatories to Google LLC, served on March 17, 2021.

7. Attached hereto as **Exhibit 5** is a true and accurate copy of Google's Second Supplemental Responses and Objections to Plaintiffs' Third Set of Interrogatories, served on April 28, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of August, at San Francisco, California.

/s/ Alexander Frawley